

DOCKET SECTION

**BEFORE THE
POSTAL RATE COMMISSION
WASHINGTON, D.C. 20268-0001**

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POSTAL RATE AND FEE CHANGES, 1997

Docket No. R97-1

**RESPONSES OF NATIONAL NEWSPAPER ASSOCIATION
TO USPS INTERROGATORIES AND REQUESTS FOR
PRODUCTION OF DOCUMENTS
(USPS/NNA-1-34)**

The National Newspaper Association ("NNA") hereby provides the following responses to the interrogatories of the United States Postal Service directed to the NNA: USPS/NNA-1-34.

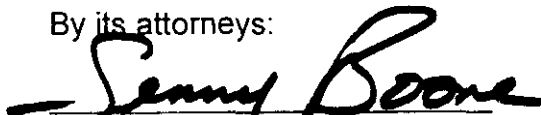
NNA does not possess responses to a number of questions posed. Pursuant to Special Rule 2A, NNA has reached an agreement with the Postal Service that the following responses will be deemed adequate subject to the Postal Service's right to conduct follow-up examination within the scope of the initial interrogatories.

Each interrogatory is stated verbatim and is followed by the response.

Respectfully submitted,

NATIONAL NEWSPAPER ASSOCIATION

By its attorneys:


Jenny Boone
Tonda Rush

USPS/NNA-1. For each year fiscal year (or calendar year if fiscal year is unavailable) from 1986 to present, please provide a list of publications published by each member of your trade association and mailed at second-class regular or periodical regular rates.

RESPONSE.

A list of members as of February 4, 1998, is provided as NNA Library Reference 4. NNA does not maintain member records on mail usage. For the data available, please refer to NNA's response to USPS/NNA T1-5.

USPS/NNA-2. For each fiscal year (or calendar year if fiscal year is unavailable) from 1986 to present, please for each publication listed in response to interrogatory number 1 the following information:

- (a) The number of issues mailed.
- (b) The average number of editions (versions) per issue.
- (c) An indication of the kind or type of each version.

RESPONSE.

(a) *NNA does not maintain records on the number of issues published, but it believes that of the total of 3,612 titles provided in NNA's Library Reference Number 4, there are 535 dailies and 3,077 weeklies. Within NNA's definitions, a "daily" newspaper is a newspaper with five or more issues per week and a "weekly" newspaper is any newspaper with fewer than five issues. Some percentage of "weekly" newspapers actually publish two or three times per week, but NNA does not maintain data on these frequencies.*

(b) *NNA does not maintain information on numbers of editions published per issue, but believes that multiple edition publishing is rare within its membership.*

(c) *NNA does not maintain information indicating the kind or type of each version.*

USPS/NNA-3. For each fiscal year (or calendar year if fiscal year is unavailable) from 1986 to present, please provide the total volumes mailed at second-class regular or periodical regular rates for each publication listed in response to interrogatory number 1.

RESPONSE.

NNA does not maintain individual member records responsive to the request. Some information responsive to this request was received by NNA by some newspapers in 1995, pursuant to a mail usage study. Please see NNA's response to USPS/NNA T1-5. Please see the response to USPS/NNA-1.

USPS/NNA-4. For each fiscal year (or calendar year if fiscal year is unavailable) from 1986 to present, please provide the volumes mailed at second-class regular or periodicals regular required presort rates for each publication listed in response to interrogatory number 1.

RESPONSE.

NNA does not maintain individual member records responsive to the request. Some information responsive to this request was received by NNA by some newspapers in 1995, pursuant to a mail usage study. Please see NNA's response to USPS/NNA T1-5. Please see the response to USPS/NNA-1.

USPS/NNA-5. For each fiscal year (or calendar year if fiscal year is unavailable) from 1986 to present, please provide the volumes mailed at second-class regular or periodical regular 3-digit city/5-digit presort rates for each publication listed in response to interrogatory number 1.

RESPONSE.

NNA has no information responsive to this request.

USPS/NNA-6. For each fiscal year (or calendar year if fiscal year is unavailable) from 1986 to present, please provide the volumes mailed at second-class regular or periodical regular carrier route presort rates for each publication listed in response to interrogatory number 1.

RESPONSE.

NNA does not maintain individual member records responsive to the request. Some information responsive to this request was received by NNA by some newspapers in 1995, pursuant to a mail usage study. Please see NNA's response to USPS/NNA T1-5. Please see the response to USPS/NNA-1.

USPS/NNA-7. For each fiscal year (or calendar year if fiscal year is unavailable) from 1986 to present, please provide the volumes mailed at second-class regular or periodical regular destination delivery office discount rates for each publication listed in response to interrogatory number 1.

RESPONSE.

NNA does not maintain individual member records responsive to the request. Some information responsive to this request was received by NNA by some newspapers in 1995, pursuant to a mail usage study. Please see NNA's response to USPS/NNA T1-5. Please see the response to USPS/NNA-1.

USPS/NNA-8. For each fiscal year (or calendar year if fiscal year is unavailable) from 1986 to present, please provide the volumes mailed at second-class regular or periodical regular destination SCF discount rates for each publication listed in response to interrogatory number 1.

RESPONSE.

NNA has no information responsive to this request.

USPS/NNA-9. For each fiscal year (or calendar year if fiscal year is unavailable) from 1986 to present, please provide the volumes mailed at second-class regular or periodical regular high-density discount rates for each publication listed in response to interrogatory number 1.

RESPONSE.

NNA does not maintain individual member records responsive to the request. Some information responsive to this request was received by NNA by some newspapers in 1995, pursuant to a mail usage study. Please see NNA's response to USPS/NNA T1-5. Please see the response to USPS/NNA-1.

USPS/NNA-10. For each fiscal year (or calendar year if fiscal year is unavailable) from 1986 to present, please provide the volumes mailed at second-class regular or periodical regular saturation discount rates for each publication listed in response to interrogatory number 1.

RESPONSE.

NNA does not maintain individual member records responsive to the request. Some information responsive to this request was received by NNA by some newspapers in 1995, pursuant to a mail usage study. Please see NNA's response to NNA/USPS T1-5. Please see the response to USPS/NNA-1.

USPS/NNA-11. For each fiscal year (or calendar year if fiscal year is unavailable) from 1986 to present, please provide the required presort volumes mailed at second-class regular or periodical regular prebarcoded letter size discount rates for each publication listed in response to interrogatory number 1.

RESPONSE.

NNA has no information responsive to this request, but notes that most newspaper mail is flat mail and would not qualify for these discounts.

USPS/NNA-12. For each fiscal year (or calendar year if fiscal year is unavailable) from 1986 to present, please provide the volumes mailed at second-class regular or periodical regular prebarcoded flat size discount rates for each publication listed in response to interrogatory number 1.

RESPONSE.

NNA has no information responsive to this request, but believes that few newspapers within its membership have attempted barcoding for addressing purposes, but are awaiting deployment of FSM-1000 sorting machines with bar code readers.

USPS/NNA-13. For each fiscal year (or calendar year if fiscal year is unavailable) from 1986 to present, please provide the 3-digit city/5-digit volumes mailed at second-class regular or periodical regular prebarcoded 3-digit letter size discount rates for each publication listed in response to interrogatory number 1.

RESPONSE.

NNA does not maintain individual member records responsive to the request. Some information responsive to this request was received by NNA by some newspapers in 1995, pursuant to a mail usage study. Please see NNA's response to USPS/NNA T1-5. Please see the response to USPS/NNA-1.

USPS/NNA-14. For each fiscal year (or calendar year if fiscal year is unavailable) from 1986 to present, please provide the 3-digit city/5-digit volumes mailed at second-class regular or periodical regular prebarcoded 5-digit letter size discount rates for each publication listed in response to interrogatory number 1.

RESPONSE.

NNA has no information responsive to this request, but notes that most newspaper mail is flat mail.

USPS/NNA-15. For each fiscal year (or calendar year if fiscal year is unavailable) from 1986 to present, please provide the 3-digit city/5-digit volumes mailed at second-class regular or periodical regular prebarcoded flat size discount rates for each publication listed in response to interrogatory number 1.

RESPONSE.

Please see NNA's response to USPS/NNA-12.

USPS/NNA-16. For each fiscal year (or calendar year if fiscal year is unavailable) from 1986 to present, please provide the volume, total weight and advertising weight mailed at second-class regular or periodical regular rates for zones 1 & 2 for each publication listed in response to interrogatory number 1.

RESPONSE.

NNA does not have any information on newspaper mail usage by periodical zone.

USPS/NNA-17. For each fiscal year (or calendar year if fiscal year is unavailable) from 1986 to present, please provide the volume, total weight and advertising weight mailed at second-class regular or periodical regular rates for zone 3 for each publication listed in response to interrogatory number 1.

RESPONSE.

NNA does not have any information on newspaper mail usage by periodical zone.

USPS/NNA-18. For each fiscal year (or calendar year if fiscal year is unavailable) from 1986 to present, please provide the volume total weight and advertising weight mailed at second-class regular or periodical regular rates for zone 4 for each publication listed in response to interrogatory number 1.

RESPONSE.

NNA does not have any information on newspaper mail usage by periodical zone.

USPS/NNA-19. For each fiscal year (or calendar year if fiscal year is unavailable) from 1986 to present, please provide the volume, total weight and advertising weight mailed at second-class regular or periodical regular rates for zone 5 for each publication listed in response to interrogatory number 1.

RESPONSE.

NNA does not have any information on newspaper mail usage by periodical zone.

USPS/NNA-20. For each fiscal year (or calendar year if fiscal year is unavailable) from 1986 to present, please provide the volume, total weight and advertising weight mailed at second-class regular or periodical regular rates for zone 6 for each publication listed in response to interrogatory number 1.

RESPONSE.

NNA does not have any information on newspaper mail usage by periodical zone.

USPS/NNA-21. For each fiscal year (or calendar year if fiscal year is unavailable) from 1986 to present, please provide the volume, total weight and advertising weight mailed at second-class regular or periodical regular rates for zone 7 for each publication listed in response to interrogatory number 1.

RESPONSE.

NNA does not have any information on newspaper mail usage by periodical zone.

USPS/NNA-22. For each fiscal year (or calendar year if fiscal year is unavailable) from 1986 to present, please provide the volume, total weight and advertising weight mailed at second-class regular or periodical regular rates for zone 8 for each publication listed in response to interrogatory number 1.

RESPONSE.

NNA does not have any information on newspaper mail usage by periodical zone.

USPS/NNA-23. For each fiscal year (or calendar year if fiscal year is unavailable) from 1986 to present, please provide the average percentage of nonadvertising content mailed at second-class regular or periodical regular rates for each publication listed in response to interrogatory number 1.

RESPONSE.

NNA does not have any information on average advertising/nonadvertising content for its members.

USPS/NNA-24. For each fiscal year (or calendar year if fiscal year is unavailable) from 1986 to present, please provide the volumes mailed on pallets at second-class regular or periodical regular rates for each publication listed in response to interrogatory number 1 by the following pallet presort levels:

- (a) 5-digit pallets
- (b) 3-digit pallets
- (c) SCF pallets
- (d) ADC/SDC pallets
- (e) BMC pallets
- (f) Mixed-MBC pallets

RESPONSE.

NNA does not have information responsive to this request, but believes palletizing is uncommon in the small newspaper universe.

USPS/NNA-25. For each fiscal year (or calendar year if fiscal year is unavailable) from 1986 to present, for those volumes mailed on pallets at second-class regular or periodical regular rates for each publication listed in response to interrogatory number 1, please provide the average number of pieces per pallet by the following pallet presort levels:

- (a) 5-digit pallets
- (b) 3-digit pallets
- (c) SCF pallets
- (d) ADC/SDC pallets
- (e) BMC pallets
- (f) Mixed-BMC pallets.

RESPONSE.

NNA does not have information responsive to this request, but believes palletizing is uncommon in the small newspaper universe.

USPS/NNA-26. For each fiscal year (or calendar year if fiscal year is unavailable) from 1986 to present, for those volumes mailed on pallets at second-class regular or periodical regular rates for each publication listed in response to interrogatory number 1, please provide the average pallet weight by the following pallet presort levels:

- (a) 5-digit pallets
- (b) 3-digit pallets
- (c) SCF pallets
- (d) ADC/SDC pallets
- (e) BMC pallets
- (f) Mixed-BMC pallets.

RESPONSE.

NNA does not have information responsive to this request, but believes palletizing is uncommon in the small newspaper universe.

USPS/NNA-27. For each fiscal year (or calendar year if fiscal year is unavailable) from 1986 to present, please provide the volumes mailed in sacks at second-class regular or periodical regular rates for each publication listed in response to interrogatory number 1 by the following sack presort levels:

- (a) Carrier route(s) sacks
- (b) Firm sacks
- (c) 5-digit sacks
- (d) 3-digit unique city sacks
- (e) 3-digit sacks
- (f) SCF sacks
- (g) ADC/SDC sacks
- (h) Mixed sacks.

RESPONSE.

NNA does not have information responsive to this request.

USPS/NNA-28. For each fiscal year (or calendar year if fiscal year is unavailable) from 1986 to present, for those volumes mailed in sacks at second-class regular or periodical regular rates for each publication listed in response to interrogatory number 1, please provide the average number of pieces per sack by the following sack presort levels:

- (a) Carrier route(s) sacks
- (b) Firm sacks
- (c) 5-digit sacks
- (d) 3-digit unique city sacks
- (e) 3-digit sacks
- (f) SCF sacks
- (g) ADC/SDC sacks
- (h) Mixed sacks.

RESPONSE.

NNA does not have information responsive to this request.

USPS/NNA-29. For each fiscal year (or calendar year if fiscal year is unavailable) from 1986 to present, please provide the volumes mailed in trays at second-class regular or periodical regular rates for each publication listed in response to interrogatory number 1 by the following tray presort levels:

- (a) Carrier route(s) sacks
- (b) Firm sacks
- (c) 5-digit sacks
- (d) 3-digit unique city sacks
- (e) 3-digit sacks
- (f) SCF sacks
- (g) ADC/SDC sacks
- (h) Mixed sacks.

RESPONSE.

NNA does not have information responsive to this request, but notes that most newspaper mail is flat mail.

USPS/NNA-30. For each fiscal year (or calendar year if fiscal year is unavailable) from 1986 to present, for those volumes mailed in trays at second-class regular or periodical regular rates for each publication listed in response to interrogatory number 1, please provide the average number of pieces per tray by the following tray presort levels:

- (a) Carrier route(s) trays
- (b) Firm trays
- (c) 5-digit trays
- (d) 3-digit unique city trays
- (e) 3-digit trays
- (f) SCF trays
- (g) ADC/SDC trays
- (h) Mixed trays.

RESPONSE.

NNA does not have information responsive to this request, but notes that most newspaper mail is flat mail.

USPS/NNA-31. For each fiscal year (or calendar year if fiscal year is unavailable) from 1986 to present, please provide the volumes mailed in bundles at second-class regular or periodical regular rates for each publication listed in response to interrogatory number 1.

RESPONSE.

NNA does not have information responsive to this request.

USPS/NNA-32. For each fiscal year (or calendar year if fiscal year is unavailable) from 1986 to present, for those volumes mailed in bundles at second-class regular or periodical regular rates for each publication listed in response to interrogatory number 1, please provide the average number of pieces per bundle.

RESPONSE.

NNA does not have information responsive to this request

USPS/NNA-33. For each fiscal year (or calendar year if fiscal year is unavailable) from 1986 to present, please provide the volumes mailed at second-class regular or periodical regular rates that were plant loaded in USPS provided transportation for each publication listed in response to interrogatory number 1.

RESPONSE.

NNA does not have information responsive to this request, but believes plant loading is uncommon within its membership.

USPS/NNA-34. Please also provide all data furnished in response to interrogatories 1 through 33 above in electronic format.

RESPONSE.

A diskette with the NNA membership list will be available with the Library Reference 4.

CERTIFICATE OF SERVICE

I hereby certify that I have this day served the foregoing document upon all participants of record in this proceeding in accordance with section 12 of the Rules of Practice.

February 5, 1998


Senny Boone